

# Exhibit A

David Abrams, Attorney at Law  
305 Broadway Suite 601  
New York, New York 10007  
Tel. 212-897-5821 dnabrams@gmail.com

Supreme Court of the State of New York  
County of Nassau

_____	)	<b><u>SUMMONS</u></b>
	)	
Sharon Narinesingh,	)	Plaintiff designates Nassau
Plaintiff,	)	County as the place of trial.
	)	
- against -	)	Venue is based on the residence of
	)	Plaintiff. Plaintiff resides at
Fedex Ground Package System Inc.,	)	2A Jackson Ave Syosset New York
	)	
Defendant.	)	
_____	)	

**To the above named Defendant(s)**

**YOU ARE HEREBY SUMMONED** to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance, on the Plaintiff's Attorney within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

DATED: New York, New York

June 8, 2022



\_\_\_\_\_  
David Abrams, Attorney at Law  
Attorney for Plaintiff  
P.O. Box 3353 Church Street Station  
New York, New York 10008  
(212) 897-5821

FILED WITH THE CLERK OF THE COURT, \_\_\_\_\_ COUNTY ON \_\_\_\_\_

David Abrams, Attorney at Law  
305 Broadway Suite 601  
New York, NY 10007  
Tel. 212-897-5821 dnabrams@gmail.com

Supreme Court of the State of New York  
County of Nassau

_____	)	
Sharon Narinesingh,	)	
	)	
Plaintiff,	)	
	)	Case No.
- against -	)	
	)	
Fedex Ground Package System, Inc.	)	<b><u>Complaint</u></b>
	)	
Defendant.	)	
	)	
_____	)	

Plaintiff, complaining of the Defendant by her attorney, David Abrams, Attorney at Law, respectfully set forth and allege as follows:

1. This is an action for unlawful discriminatory workplace harassment and in violation of the New York State Human Rights Law.
2. Plaintiff Sharon Narinesingh ("Ms. Narinesingh") is a natural person. Plaintiff is 58 years old.
3. Defendant Fedex Ground Package System, Inc. (the "Employer") is a foreign business corporation.
4. At all times relevant to this Complaint, the Employer operated a delivery service.
5. Ms. Narinesingh was employed by the Employer as a worker at its Bethpage, New York sorting facility from approximately May 2020 through September of 2021.
6. Plaintiff had two managers, Dakyya Cherry and Nichola Chin who repeatedly made derogatory comments towards Ms. Narinesingh related to Ms. Narinesingh's age.

7. More specifically, they regularly referred to her and addressed her as "grandma" or "great-grandma," stated that she was "old enough to be a grandmother," etc.

8. These incidents happened approximately 2-3 times a week and frequently took place in front of other workers. Also, these comments were made over Ms. Narinesingh's objections, i.e. she complained numerous times about this treatment to various persons in management about this treatment but the treatment persisted.

**As and for a First Cause of Action**

9. At all times relevant to this matter, the Defendant was covered under the New York State Human Rights Laws in that the Defendant employed more than 4 persons and Ms. Narinesingh was employed in the State of New York.

10. The conduct described above constitutes unlawful discrimination under the New York State Human Rights Law, specifically the creation of a hostile working environment on the basis of age.

WHEREFORE Plaintiff demands judgment against the Defendant for compensatory, punitive damages, attorneys fees, and such other and further relief as the Court deems just in an amount not to exceed \$1 million dollars.

Respectfully submitted,



David Abrams  
Attorney for Plaintiff  
305 Broadway Suite 601  
New York, NY 10007  
Tel. 212-897-5821  
Fax 212-897-5811

Dated: June 8, 2022  
New York, New York

David Abrams, Attorney at Law  
305 Broadway Suite 601  
New York, New York 10007  
Tel. 212-897-5821 dnabrams@gmail.com

Supreme Court of the State of New York  
County of Nassau

_____	)	
	)	
Sharon Narinesingh,	)	
Plaintiff,	)	Case No. 607467/2022
	)	
- against -	)	
	)	
Fedex Ground Package System Inc.,	)	<u>Notice of Motion</u>
	)	
Defendant.	)	
_____	)	

PLEASE TAKE NOTICE that upon the annexed Affirmation of David Abrams dated July 31, 2022, and all prior filings in this matter, Plaintiff will move at the Nassau Supreme Court, located at 100 Supreme Ct Dr, Mineola, NY 11501 on August 22, 2022 at 9:30am or as soon thereafter as counsel may be heard, for an order granting default judgment against the Defendant pursuant to CPLR 3215 based on a failure to plead and granting such other and further relief as the Court deems just.

The above entitled action is for unlawful discrimination / hostile working environment on the basis of perceived age.

[continued on next page]

Pursuant to CPLR 2214(b), answering affidavits, if any, are required to be served upon the undersigned at least 2 days before the return date of this motion.



---

David Abrams, Attorney at Law  
Attorney for Plaintiff  
305 Broadway Suite 601  
New York, NY 10007  
Tel. 212-897-5821  
Fax 212-897-5811

Dated: New York, NY  
July 31, 2022

David Abrams, Attorney at Law  
305 Broadway Suite 601  
New York, New York 10007  
Tel. 212-897-5821 dnabrams@gmail.com

Supreme Court of the State of New York  
County of Nassau

_____	)	
	)	
Sharon Narinesingh,	)	
Plaintiff,	)	Case No. 607467/2022
	)	
- against -	)	
	)	
Fedex Ground Package System Inc.,	)	
	)	
	)	
Defendant.	)	
_____	)	

**Affirmation of David Abrams in Support of Motion for Default Judgment**

David Abrams, an attorney duly admitted to practice before the Courts of the State of New York, affirms the following statement under penalty of perjury.

- I am the attorney for the Plaintiff in this matter. I make this affirmation in support of Plaintiff's motion for Default Judgment. The motion is based on the Defendant's failure to appear, plead, or otherwise answer in this matter.
- Attached hereto as Exhibit A is a true copy of the Summons, Complaint and Electronic Filing Notice in this matter.
- Attached hereto as Exhibit B is a true copy of the Proof of Service in this matter. As indicated on the Proof of Service, the Defendant was duly served with the Summons Complaint and Electronic Filing Notice on June 16, 2022.
- Since then, I have received no Answer, Appearance or responsive motion from or on behalf of the Defendant.

5. Attached hereto as Exhibit C is my affirmation of compliance with CPLR 3215(g)(4).
6. Since the return date of this motion is at least 20 days after supplemental service pursuant to CPLR 3215(g)(4), more than 20 days will have elapsed between (1) additional service pursuant to CPLR 3215(g)(4); and (2) entry of judgment in this matter.
7. Thus, the Court should enter default judgment against the Defendant in this matter.
8. Attached hereto as Exhibit D is Plaintiff's Affidavit in support of this motion.
9. As set forth in the Affidavit, my client alleges that she is the victim of a hostile working environment on the basis of perceived age in violation of the New York State Human Rights Law.
10. I respectfully request that the Court enter judgment in my client's favor in the amount of \$100,000 together with costs and fees.

Respectfully submitted,



---

David Abrams, Attorney at Law  
Attorney for Plaintiff  
305 Broadway Suite 601  
New York, NY 10007  
Tel. 212-897-5821 dnabrams@gmail.com

Dated: New York, NY  
July 31, 2022

# Exhibit A

David Abrams, Attorney at Law  
305 Broadway Suite 601  
New York, New York 10007  
Tel. 212-897-5821 dnabrams@gmail.com

Supreme Court of the State of New York  
County of Nassau

_____	)	<b><u>SUMMONS</u></b>
	)	
Sharon Narinesingh,	)	Plaintiff designates Nassau
Plaintiff,	)	County as the place of trial.
	)	
- against -	)	Venue is based on the residence of
	)	Plaintiff. Plaintiff resides at
Fedex Ground Package System Inc.,	)	2A Jackson Ave Syosset New York
	)	
Defendant.	)	
_____	)	

**To the above named Defendant(s)**

**YOU ARE HEREBY SUMMONED** to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance, on the Plaintiff's Attorney within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

DATED: New York, New York

June 8, 2022



\_\_\_\_\_  
David Abrams, Attorney at Law  
Attorney for Plaintiff  
P.O. Box 3353 Church Street Station  
New York, New York 10008  
(212) 897-5821

FILED WITH THE CLERK OF THE COURT, \_\_\_\_\_ COUNTY ON \_\_\_\_\_

David Abrams, Attorney at Law  
305 Broadway Suite 601  
New York, NY 10007  
Tel. 212-897-5821 dnabrams@gmail.com

Supreme Court of the State of New York  
County of Nassau

_____	)	
Sharon Narinesingh,	)	
	)	
Plaintiff,	)	Case No.
	)	
- against -	)	
	)	
Fedex Ground Package System, Inc.	)	<b><u>Complaint</u></b>
	)	
Defendant.	)	
	)	
_____	)	

Plaintiff, complaining of the Defendant by her attorney, David Abrams, Attorney at Law, respectfully set forth and allege as follows:

1. This is an action for unlawful discriminatory workplace harassment and in violation of the New York State Human Rights Law.
2. Plaintiff Sharon Narinesingh ("Ms. Narinesingh") is a natural person. Plaintiff is 58 years old.
3. Defendant Fedex Ground Package System, Inc. (the "Employer") is a foreign business corporation.
4. At all times relevant to this Complaint, the Employer operated a delivery service.
5. Ms. Narinesingh was employed by the Employer as a worker at its Bethpage, New York sorting facility from approximately May 2020 through September of 2021.
6. Plaintiff had two managers, Dakyya Cherry and Nichola Chin who repeatedly made derogatory comments towards Ms. Narinesingh related to Ms. Narinesingh's age.

7. More specifically, they regularly referred to her and addressed her as "grandma" or "great-grandma," stated that she was "old enough to be a grandmother," etc.

8. These incidents happened approximately 2-3 times a week and frequently took place in front of other workers. Also, these comments were made over Ms. Narinesingh's objections, i.e. she complained numerous times about this treatment to various persons in management about this treatment but the treatment persisted.

**As and for a First Cause of Action**

9. At all times relevant to this matter, the Defendant was covered under the New York State Human Rights Laws in that the Defendant employed more than 4 persons and Ms. Narinesingh was employed in the State of New York.

10. The conduct described above constitutes unlawful discrimination under the New York State Human Rights Law, specifically the creation of a hostile working environment on the basis of age.

WHEREFORE Plaintiff demands judgment against the Defendant for compensatory, punitive damages, attorneys fees, and such other and further relief as the Court deems just in an amount not to exceed \$1 million dollars.

Respectfully submitted,



David Abrams  
Attorney for Plaintiff  
305 Broadway Suite 601  
New York, NY 10007  
Tel. 212-897-5821  
Fax 212-897-5811

Dated: June 8, 2022  
New York, New York

**SUPREME COURT OF THE STATE OF NEW YORK**  
**COUNTY OF NASSAU**

-----X  
Sharon Narinesingh

Plaintiff/Petitioner,

- against -

Index No. 607467/2022

Fedex Ground Package System, Inc.

Defendant/Respondent.  
-----X

**NOTICE OF ELECTRONIC FILING**  
**(Mandatory Commencement Case)**  
(Uniform Rule § 202.5-bb(a)(2)(v) and (vi))

**You have received this Notice because:**

- 1) The Plaintiff/Petitioner, whose name is listed above, was required to file this case using the New York State Courts E-filing system ("NYSCEF"), and
- 2) You are a Defendant/Respondent (a party) in this case.

● **If you are represented by an attorney:**

Give this Notice to your attorney. (Attorneys: see "Information for Attorneys" pg. 2).

● **If you are not represented by an attorney:**

**You will be served with all documents in paper and you must serve and file your documents in paper, unless you choose to participate in e-filing.**

**If you choose to participate in e-filing, you must have access to a computer and a scanner or other device to convert documents into electronic format, a connection to the internet, and an e-mail address to receive service of documents.**

The **benefits of participating in e-filing** include:

- serving and filing your documents electronically
- free access to view and print your e-filed documents
- limiting your number of trips to the courthouse
- paying any court fees on-line (credit card needed)

**To register for e-filing or for more information about how e-filing works:**

- visit: <https://iapps.courts.state.ny.us/nyscef/UnRepresentedHome> or
- contact the Clerk's Office or Help Center at the court where the case was filed. Court contact information can be found at [www.nycourts.gov](http://www.nycourts.gov)

To find legal information to help you represent yourself visit [www.nycourthelp.gov](http://www.nycourthelp.gov)

**Information for Attorneys  
(E-filing Commencement Documents is Mandatory)**

Attorneys representing a party must either consent or decline consent to electronic filing and service through NYSCEF for this case.

Attorneys registered with NYSCEF may record their consent electronically in the manner provided at the NYSCEF site. Attorneys not registered with NYSCEF but intending to participate in e-filing must first create a NYSCEF account and obtain a user ID and password prior to recording their consent by going to [www.nycourts.gov/efile](http://www.nycourts.gov/efile).

Attorneys declining to consent must file with the court and serve on all parties of record a declination of consent.

For additional information about electronic filing and to create a NYSCEF account, visit the NYSCEF website at [www.nycourts.gov/efile](http://www.nycourts.gov/efile) or contact the NYSCEF Resource Center ( phone: 646-386-3033; e-mail: [nyscef@nycourts.gov](mailto:nyscef@nycourts.gov) ).

Dated: 6/9/2022

Name     David Abrams

Address  
305 Broadway Suite 601 NY NY 10007

Firm Name     David Abrams, Attorney at Law

Phone     212-897-5821

dnabrams@gmail.com  
E-Mail

To:     Defendant  
\_\_\_\_\_  
  
\_\_\_\_\_  
  
\_\_\_\_\_

6/6/18

# Exhibit B

ATTORNEY(s) : Law Office of David Abrams

INDEX # : 607467/2022

PURCHASED/FILED : June 8, 2022

STATE OF : NEW YORK

COURT : Supreme

COUNTY/DISTRICT : Nassau

**AFFIDAVIT OF SERVICE - SECRETARY OF STATE**

Sharon Narinesingh

Plaintiff(s)

against

FedEx Ground Package System Inc.

Defendant(s)

STATE OF NEW YORK )  
COUNTY OF ALBANY ) SS  
CITY OF ALBANY )

**DESCRIPTION OF PERSON SERVED:**

Approx. Age: 45 Yrs.

Weight: 160 Lbs. Height: 5' 10" Sex: Female Color of skin: White

Hair color: Blonde Other:

**Robert Guyette**, being duly sworn, deposes and says: deponent is over the age of eighteen (18) years; is not a party to this action, and resides in the State of NY, and that on **June 16, 2022**, at **1:00 PM**, at the office of the Secretary of State of the State of NY, located at 99 Washington Ave, 6th Fl, Albany, New York 12231 deponent served:

**Summons and Verified Complaint with Notice of Electronic Filing ( Mandatory Commencement Case )**

on

**FedEx Ground Package System Inc.**

the Defendant in this action, by delivering to and leaving with


**Amy Lesch**


AUTHORIZED AGENT in the Office of the Secretary of State, of the State of New York, personally at the Office of the Secretary of State of the State of New York, two (2) true copies thereof and that at the time of making such service, deponent paid said Secretary of State a fee of \$40 dollars; That said service was made pursuant to Section **BUSINESS CORPORATION LAW §306.**

Deponent further says that deponent knew the person so served as aforesaid to be the agent in the Office of the Secretary of State of the State of New York, duly authorized to accept such service on behalf of said defendant.

Sworn to before me on this

16th day of June 2022

  
FAITH COZZY  
NOTARY PUBLIC, State of New York  
No. 01CO6158874, Albany County  
Commission Expires Jan 8, 2023

  
Robert Guyette  
Invoice-Work Order # 2220906  
Attorney File # Narinesingh

# Exhibit C

David Abrams, Attorney at Law  
305 Broadway Suite 601  
New York, New York 10007  
Tel. 212-897-5821 dnabrams@gmail.com

Supreme Court of the State of New York  
County of Nassau

_____	)	
	)	
Sharon Narinesingh,	)	
Plaintiff,	)	Case No. 607467/2022
	)	
- against -	)	
	)	
Fedex Ground Package System Inc.,	)	
	)	
	)	
Defendant.	)	
_____	)	


**Affirmation of Compliance with CPLR 3215(g)(4)**

David Abrams, an attorney duly admitted to practice before the Courts of the State of New York, affirms the following statement under penalty of perjury.

- I am the attorney for the Plaintiff in this matter. I make this affirmation in support of Plaintiff's motion for Default Judgment.
- On July 31, 2022 I served an additional copy of the summons and complaint in this matter on the Defendant at its last known address. The foregoing service of the summons and complaint was made together with notice that the same had been served on the Defendant pursuant to CPLR 306, and these materials were sent first class mail, postage prepaid, in a secure envelope, mailed from within the State of New York and deposited in a postal depository in the exclusive custody of the United States Postal Service.

3. Since the return date of my default judgment motion is more than 20 days after July 31, 2022, it follows that judgment will not be entered until more than 20 days after the foregoing Service.

Respectfully submitted,



---

David Abrams, Attorney at Law  
Attorney for Plaintiff  
305 Broadway Suite 601  
New York, NY 10007  
Tel. 212-897-5821 dnabrams@gmail.com

Dated: New York, NY  
July 31, 2022

# Exhibit D

David Abrams, Attorney at Law  
305 Broadway Suite 601  
New York, New York 10007  
Tel. 212-897-5821 dnabrams@gmail.com

Supreme Court of the State of New York  
County of Nassau

Sharon Narinesingh,  
Plaintiff,

- against -

Fedex Ground Package System Inc.,

Defendant.

Affidavit of Sharon Narinesingh in Support of Motion for Default Judgment

State of New York )  
County of New York ) ss.:

Sharon Narinesingh, being duly sworn, deposes and says:

1. I am the Plaintiff in the above-referenced matter and I make this affidavit in support of my motion for default judgment. I am more than 55 years of age.
2. The Defendant in this matter is a package delivery service; it has thousands of employees throughout New York.
3. I was employed by the Defendant as a worker at its Bethpage, New York sorting facility from approximately May 2020 through September of 2021.
4. I had two managers, <sup>Z</sup>Dakyya Cherry and Nichola Chin who repeatedly made derogatory comments towards me concerning my age.
5. More specifically, these individuals regularly referred to me and addressed as me as "grandma" or "great-grandma," stated that I was "old enough to be a grandmother," etc.
6. These incidents happened approximately 2-3 times a week and frequently took place in front of other workers.

7. These comments were made over my objections, i.e. I complained numerous times about this treatment to these managers and to others in management but the treatment persisted.
8. I found this treatment to be extremely humiliating and it caused me great stress and anguish.
9. I am requesting that the Court award me \$100,000 in compensatory damages for the emotional upset at being the victim of this treatment based on my age.

Sharon Narinesingh being duly sworn, deposes and says: that he/she is the Plaintiff herein; that he/she has read (or had read to him/her) the foregoing Affidavit and knows the content thereof; that the same is true of his/her own knowledge except as to the matters therein stated on information and belief; and that as to those matters, he/she believes the same to be true.

Sharon Narinesingh

Subscribed and sworn to before me this

29 day of July, 2022.

[Signature]  
Dated: New York, New York

July 29, 2022

LISA A C TENN  
Notary Public, State of New York  
No. 01TE6395736  
Qualified in Queens County  
Commission Expires August 5, 2023



REQUEST FOR JUDICIAL INTERVENTION

Supreme COURT, COUNTY OF Nassau

UCS-840  
(rev. 02/01/2022)

Index No: 607467/2022 Date Index Issued: 06/09/2022

For Court Use Only:

<b>CAPTION</b> Enter the complete case caption. Do not use et al or et ano. If more space is needed, attach a caption rider sheet.	IAS Entry Date
Sharon Narinesingh	
	Judge Assigned
-against- Plaintiff(s)/Petitioner(s)	
Fedex Ground Package System, Inc.	RJI Filed Date
Defendant(s)/Respondent(s)	

NATURE OF ACTION OR PROCEEDING: Check only one box and specify where indicated.

<b>COMMERCIAL</b> <input type="checkbox"/> Business Entity (includes corporations, partnerships, LLCs, LLPs, etc.) <input type="checkbox"/> Contract <input type="checkbox"/> Insurance (where insurance company is a party, except arbitration) <input type="checkbox"/> UCC (includes sales and negotiable instruments) <input checked="" type="checkbox"/> Other Commercial (specify): Statutory Human Rights <b>NOTE:</b> For Commercial Division assignment requests pursuant to 22 NYCRR 202.70(d), complete and attach the <b>COMMERCIAL DIVISION RJI ADDENDUM (UCS-840C)</b> .	<b>MATRIMONIAL</b> <input type="checkbox"/> Contested <b>NOTE:</b> If there are children under the age of 18, complete and attach the <b>MATRIMONIAL RJI Addendum (UCS-840M)</b> . For Uncontested Matrimonial actions, use the Uncontested Divorce RJI ( <b>UD-13</b> ). <b>REAL PROPERTY</b> Specify how many properties the application includes: _____ <input type="checkbox"/> Condemnation <input type="checkbox"/> Mortgage Foreclosure (specify): <input type="checkbox"/> Residential <input type="checkbox"/> Commercial Property Address: _____ <b>NOTE:</b> For Mortgage Foreclosure actions involving a one to four-family, owner-occupied residential property or owner-occupied condominium, complete and attach the <b>FORECLOSURE RJI ADDENDUM (UCS-840F)</b> . <input type="checkbox"/> Partition <b>NOTE:</b> Complete and attach the <b>PARTITION RJI ADDENDUM (UCS-840P)</b> . <input type="checkbox"/> Tax Certiorari (specify): Section: _____ Block: _____ Lot: _____ <input type="checkbox"/> Tax Foreclosure <input type="checkbox"/> Other Real Property (specify): _____
<b>TORTS</b> <input type="checkbox"/> Asbestos <input type="checkbox"/> Child Victims Act <input type="checkbox"/> Environmental (specify): _____ <input type="checkbox"/> Medical, Dental or Podiatric Malpractice <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Products Liability (specify): _____ <input type="checkbox"/> Other Negligence (specify): _____ <input type="checkbox"/> Other Professional Malpractice (specify): _____ <input type="checkbox"/> Other Tort (specify): _____	<b>OTHER MATTERS</b> <input type="checkbox"/> Certificate of Incorporation/Dissolution [see <b>NOTE</b> in <b>COMMERCIAL</b> section] <input type="checkbox"/> Emergency Medical Treatment <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Local Court Appeal <input type="checkbox"/> Mechanic's Lien <input type="checkbox"/> Name Change/Sex Designation Change <input type="checkbox"/> Pistol Permit Revocation Hearing <input type="checkbox"/> Sale or Finance of Religious/Not-for-Profit Property <input type="checkbox"/> Other (specify): _____

<b>SPECIAL PROCEEDINGS</b> <input type="checkbox"/> Child-Parent Security Act (specify): <input type="checkbox"/> Assisted Reproduction <input type="checkbox"/> Surrogacy Agreement <input type="checkbox"/> CPLR Article 75 - Arbitration [see <b>NOTE</b> in <b>COMMERCIAL</b> section] <input type="checkbox"/> CPLR Article 78 - Proceeding against a Body or Officer <input type="checkbox"/> Election Law <input type="checkbox"/> Extreme Risk Protection Order <input type="checkbox"/> MHL Article 9.60 - Kendra's Law <input type="checkbox"/> MHL Article 10 - Sex Offender Confinement (specify): <input type="checkbox"/> Initial <input type="checkbox"/> Review <input type="checkbox"/> MHL Article 81 (Guardianship) <input type="checkbox"/> Other Mental Hygiene (specify): _____ <input type="checkbox"/> Other Special Proceeding (specify): _____
--

STATUS OF ACTION OR PROCEEDING Answer YES or NO for every question and enter additional information where indicated.

	YES	NO	
Has a summons and complaint or summons with notice been filed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	If yes, date filed: 06/09/2022
Has a summons and complaint or summons with notice been served?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	If yes, date served: 06/16/2022
Is this action/proceeding being filed post-judgment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	If yes, judgment date: _____

NATURE OF JUDICIAL INTERVENTION Check one box only and enter additional information where indicated.

<input type="checkbox"/> Infant's Compromise	
<input type="checkbox"/> Extreme Risk Protection Order Application	
<input type="checkbox"/> Note of Issue/Certificate of Readiness	
<input type="checkbox"/> Notice of Medical, Dental or Podiatric Malpractice	Date Issue Joined: _____
<input checked="" type="checkbox"/> Notice of Motion	Relief Requested: Judgment - Default
<input type="checkbox"/> Notice of Petition	Relief Requested: _____
<input type="checkbox"/> Order to Show Cause	Relief Requested: _____
<input type="checkbox"/> Other Ex Parte Application	Relief Requested: _____
<input type="checkbox"/> Partition Settlement Conference	
<input type="checkbox"/> Poor Person Application	
<input type="checkbox"/> Request for Preliminary Conference	
<input type="checkbox"/> Residential Mortgage Foreclosure Settlement Conference	
<input type="checkbox"/> Writ of Habeas Corpus	
<input type="checkbox"/> Other (specify): _____	

RELATED CASES				
List any related actions. For Matrimonial cases, list any related criminal or Family Court cases. If none, leave blank. If additional space is required, complete and attach the <b>RJI Addendum (UCS-840A)</b> .				
Case Title	Index/Case Number	Court	Judge (if assigned)	Relationship to instant case

PARTIES				
For parties without an attorney, check the "Un-Rep" box and enter the party's address, phone number and email in the space provided. If additional space is required, complete and attach the <b>RJI Addendum (UCS-840A)</b> .				
Un-Rep	Parties	Attorneys and Unrepresented Litigants	Issue Joined	Insurance Carriers
	List parties in same order as listed in the caption and indicate roles (e.g., plaintiff, defendant, 3 <sup>rd</sup> party plaintiff, etc.)	For represented parties, provide attorney's name, firm name, address, phone and email. For unrepresented parties, provide party's address, phone and email.	For each defendant, indicate if issue has been joined.	For each defendant, indicate insurance carrier, if applicable.
<input type="checkbox"/>	Name: Narinesingh, Sharon Role(s): Plaintiff/Petitioner	David Abrams, David Abrams, Attorney at Law, 305 Broadway Suite 601 , New York, NY 10007, (212) 897-5821, dnabrams@gmail.com	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
<input checked="" type="checkbox"/>	Name: Fedex Ground Package System, Inc. Role(s): Defendant/Respondent	1000 Fedex Dr, Moon Township, PA 15108	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
<input type="checkbox"/>	Name: Role(s):		<input type="checkbox"/> YES <input type="checkbox"/> NO	
<input type="checkbox"/>	Name: Role(s):		<input type="checkbox"/> YES <input type="checkbox"/> NO	
<input type="checkbox"/>	Name: Role(s):		<input type="checkbox"/> YES <input type="checkbox"/> NO	
<input type="checkbox"/>	Name: Role(s):		<input type="checkbox"/> YES <input type="checkbox"/> NO	
<input type="checkbox"/>	Name: Role(s):		<input type="checkbox"/> YES <input type="checkbox"/> NO	
<input type="checkbox"/>	Name: Role(s):		<input type="checkbox"/> YES <input type="checkbox"/> NO	
<input type="checkbox"/>	Name: Role(s):		<input type="checkbox"/> YES <input type="checkbox"/> NO	
<input type="checkbox"/>	Name: Role(s):		<input type="checkbox"/> YES <input type="checkbox"/> NO	

I AFFIRM UNDER THE PENALTY OF PERJURY THAT, UPON INFORMATION AND BELIEF, THERE ARE NO OTHER RELATED ACTIONS OR PROCEEDINGS, EXCEPT AS NOTED ABOVE, NOR HAS A REQUEST FOR JUDICIAL INTERVENTION BEEN PREVIOUSLY FILED IN THIS ACTION OR PROCEEDING.

Dated: 07/31/2022

David Nehemiah Abrams

Signature

3051604

Attorney Registration Number

David Nehemiah Abrams

Print Name

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NASSAU

SHARON NARINESINGH,

Plaintiff,

v.

FEDEX GROUND PACKAGE,  
SYSTEM INC.,

Defendant.

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:  
:

**NOTICE OF APPEARANCE**

Case No.: 607467/2022

**PLEASE TAKE NOTICE** that Justin W. Reiter of the law firm Fisher & Phillips LLP, 7 Times Square, Suite 4300, New York, New York 10036, hereby enters his appearance as counsel for Fedex Ground Package System Inc. (“Defendant”) in the above-captioned matter and that all papers in this action shall be served upon the undersigned at the office and address stated below.

Dated: New York, New York  
August 18, 2022

FISHER & PHILLIPS, LLP

By s/ Justin W. Reiter  
Justin W. Reiter  
Fisher & Phillips LLP  
Times Square Tower  
7 Times Square, Suite 4300  
New York, NY 10036  
Tel.: (212) 899-9985  
jreiter@fisherphillips.com

*Attorneys for Defendant  
Fedex Ground Package System Inc.*

**AFFIDAVIT OF SERVICE**

The undersigned attorney hereby certifies that on August 18, 2022, a true and correct copy of the foregoing Notice of Appearance was electronically filed via the Court's electronic filing system and a true and correct copy was served upon all parties registered to receive service.

s/ Justin W. Reiter

Justin W. Reiter

Supreme Court of the State of New York  
County of Nassau

_____	)	
	)	
Sharon Narinesingh,	)	
Plaintiff,	)	Case No. 607467/2022
	)	
- against -	)	
	)	
Fedex Ground Package System Inc.,	)	<u>Stipulation</u>
	)	
	)	
Defendant.	)	
_____	)	

It is hereby stipulated and agreed that Plaintiff's motion for default judgment, currently returnable for August 22, 2022, is adjourned to the first available date on or after September 22, 2022, and it is further

STIPULATED AND AGREED that any opposition shall be served at least 7 days before the new return date; and it is further

STIPULATED AND AGREED that any reply papers shall be served at least 2 days before the new return date.




\_\_\_\_\_  
David Abrams, Attorney at Law  
Attorney for Plaintiff  
305 Broadway Suite 601  
New York, NY 10007  
Tel. 212-897-5821

Dated: New York, NY  
August 17, 2022

[continued on next page]

FISHER & PHILLIPS LLP

By  \_\_\_\_\_

Justin W. Reiter  
Attorneys for Defendant  
Times Square Tower  
7 Times Square, Suite 4300  
New York, New York 10036  
(212) 899-9985

Dated: New York, New York  
August 17, 2022

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NASSAU  
JUDGE DALY-SAPRAICONE, EILEEN C**



**Sharon Narinesingh**

**Index No. 607467/2022**

**- v. -**

**Fedex Ground Package System, Inc.**

**COURT NOTICE**

Filing on Behalf of - Marissa Pullano

The Court is directing a return date of September 29, 2022. Opposition to be filed by September 22, 2022 and reply papers by September 27, 2022. Thank you.

DATED 08/18/2022

FILED By Marissa Pullano